

REMARKS

Applicant requests favorable reconsideration and allowance of this application in view of the foregoing amendments and the following remarks.

Claims 1, 3, 5-17, 19, and 21-23 are pending in this application, with Claims 1, 17, 19, and 22 being independent.

Claims 1, 17, 19, and 22 have been amended. Applicant submits that support for the amendments can be found in the original disclosure, and therefore no new matter has been added.

Claims 1, 3, 5-11, 16, 17, 19 and 21-23 were rejected under 35 U.S. C. 103(a) as being unpatentable over U.S. Patent No. 6,785,814 (Usami et al.) in view of U.S. Patent No. 6,504,941 (Wong). Claims 12-15 were rejected under 35 U.S.C. 103(a) as being unpatentable over Usami et al. and Wong in view of U.S. Patent Publication No. 2001/0013097 (Ito et al.). Applicant respectfully traverses these rejections for the reasons discussed below.

As recited in independent Claim 1, the present invention includes, *inter alia*, the features of means for repeatedly adding additional information to image data so as to make it difficult to visually identify the additional information and means for encrypting the information-added data to make it difficult to detect a position where the additional information is added and for outputting the encrypted information-added data to an image forming apparatus, wherein the information-added data is encrypted by randomly arranging the information-added data. Applicant submits that the cited art fails to disclose or suggest at least these features of independent Claim 1.

Usami et al. discloses that division means 22 divides an image represented by original image data S0 into areas of a plurality of blocks to obtain image data Sn for each area. Supplementary information generating means 23 generates information regarding photographing as supplementary information H. Optimization means 24 obtains supplementary information Hn for each area by optimizing supplementary information H for each area divided by the division means 22. Then, embedding means 25 embeds the supplementary information Hn for each area in the image data Sn for the corresponding area using deep layer encryption to obtain image data S1 embedded with the supplementary information H. (See, e.g., col. 12, line 17 to col. 13, line 12.) Thus, Usami et al. merely discloses that the supplementary information Hn is encrypted and the encrypted information is added to the image data Sn. However, that patent does not disclose or suggest encrypting the image data Sn *after* the supplementary information Hn has been added. Accordingly, as recognized by the Examiner, that patent does not disclose or suggest at least the feature of Claim 1 for encrypting the information-added data to make it difficult to detect a position where the additional information is added.

The other cited art also fails to disclose or suggest at least the above-mentioned features. Wong discloses a digital watermarking technique. As shown in Figs. 9A and 9B of that patent, a predetermined bit of an image block Xr is modified to generate a modified image block Xz. A hashed output is calculated from the modified image block Xz, and a combined image block Cr is generated by combining the hashed output with a watermark Br. The combined image block Cr is then incorporated into the modified image block Xz. Thus, Wong merely discloses calculating a hashed output for the modified image block Xz, which is an image prior to incorporation of the watermark. Like Usumi et al., Wong does

not disclose or suggest at least the feature of encrypting information-added data. Instead, in Wong, the information-added data could correspond to the watermark image block Yr, which is not encrypted.

The other cited art also fails to disclose or suggest at least the above-mentioned features of the invention recited in independent Claim 1. Accordingly, Applicant submits that Claim 1 is patentable over the art of record.

Independent Claims 17, 19, and 22 recite similar features and are believed patentable for reasons similar to Claim 1. The dependent claims are patentable for at least the same reasons as the independent claims, as well as for the additional features they recite.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,



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